

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

STATE OF ALABAMA, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 2:18-cv-00772-RDP
)	
UNITED STATES DEPARTMENT OF COMMERCE, <i>et al.</i> ,)	
)	
Defendants.)	
)	

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ANSWER

Defendants United States Department of Commerce, Wilbur L. Ross, Bureau of the Census, and Ron S. Jarmin (“Defendants”), through their undersigned counsel, hereby move for a 30-day extension of time to file an Answer in this case. As set forth below, counsel for Defendants has conferred with other parties in this litigation, who do not oppose this extension request. In support of their motion, Defendants state as follows:

1. This Court denied Defendants’ motion to dismiss on June 5, 2019. Accordingly, Defendants’ Answer to the Complaint is currently due on June 19, 2019. *See* Fed. R. Civ. P. 12(a)(4)(A).
2. Defendants request a 30-day extension of time, to and including July 19, 2019, to file an Answer.
3. Plaintiffs’ Complaint is substantial in length, totaling 34 pages and 158 paragraphs. Moreover, preparing the Answer will require internal governmental coordination. Accordingly, an extension of time is necessary in order to allow Defendants adequate time to prepare their Answer.

4. Undersigned counsel for Defendants has conferred with counsel for Plaintiff State of Alabama regarding this motion. Plaintiff State of Alabama has represented that Plaintiffs do not oppose this request. Moreover, neither the local government intervenor-defendants nor the *Martinez* intervenor-defendants oppose this request, though the *Martinez* intervenor-defendants have requested that their time to file an Answer also be extended by 30 days. Accordingly, and in order to align the answer deadline for all parties filing answers in this litigation, Defendants request that the answer deadline be extended for all parties until July 19, 2019.

5. Granting the motion will not prejudice any parties or affect any other deadlines in this case.

6. A proposed order is attached hereto.

Dated: June 13, 2019

Respectfully submitted,

JOSEPH H. HUNT
Assistant Attorney General

JOHN R. GRIFFITHS
Director, Federal Programs Branch

CARLOTTA P. WELLS
Assistant Branch Director

/s/ Brad P. Rosenberg
BRAD P. ROSENBERG (DC Bar #467513)
Assistant Branch Director
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, N.W.
Washington, DC 20005
Tel.: (202) 514-3374
Fax: (202) 616-8460
Email: brad.rosenberg@usdoj.gov

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on June 13, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

For Plaintiff State of Alabama:

Edmund G. LaCour	elacour@ago.state.al.us
Steven Troy Marshall	smarshall@ago.state.al.us
James W. Davis	jimdavis@ago.state.al.us
Winfield J. Sinclair	wsinclair@ago.state.al.us
Brad A. Chynoweth	bchynoweth@ago.state.al.us

For Intervenor-Defendants:

Denise Marie Hulett	dhulett@maldef.org
James U. Blacksher	jblacksher@ns.sympatico.ca
Andrea E. Senteno	asenteno@maldef.org
W. Edward Still	Still@votelaw.com
Ming Ming Yang	mmyang@debevoise.com
Robin Thurston	rthurston@democracyforward.org
Anil A. Mujumdar	anil@zarzaur.com
Jyotin Hamid	jhamid@debevoise.com
Lauren M. Dolecki	lmdolecki@debevoise.com
Ryan M. Kusmin	rmkusmin@debevoise.com
Robert D. Segall	segall@copelandfranco.com
Danielle Luce Goldstein	danielle.goldstein@cco.sccgov.org
Jonathan Weisglass	jonathan@weissglass.com
Marcelo Quinones	marcelo.quinones@cco.sccgov.org
Dorian Lawrence Spence	dspence@lawyerscommittee.org
Ezra Rosenberg	erosenberg@lawyerscommittee.org
Julia A. Gomez	jgomez@maldef.org
Thomas A. Saenz	tsaenz@maldef.org

I also hereby certify that I have caused to be mailed by FedEx Overnight Delivery the document to the following non-CM/ECF participant:

Morris J. Brooks, Jr.
2101 W. Clinton Ave.
Suite 302
Huntsville, AL 35805

/s/ Brad P. Rosenberg
BRAD P. ROSENBERG (DC Bar #467513)
Assistant Branch Director
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, N.W.
Washington, DC 20005
Tel.: (202) 514-3374
Fax: (202) 616-8460
Email: brad.rosenberg@usdoj.gov

Counsel for Defendants